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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

AMERICAN IMMIGRATION COUNCIL, <i>et al.</i> ,	)	No. 4:20-cv-03266-DMR
	)	
Plaintiffs,	)	<b>JOINT REQUEST FOR 60-DAY STAY;</b>
	)	<b>ORDER</b>
v.	)	
	)	
UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, <i>et al.</i> ,	)	
	)	
Defendant.	)	

Plaintiffs American Immigration Council, American Immigration Lawyers Association, and Human Rights Watch (“Plaintiffs”) and defendants United States Citizenship and Immigration Services, United States Customs and Border Protection, and United States Immigration and Customs Enforcement (“Defendants,” and together with the Plaintiffs, the “Parties”), by and through their undersigned counsel, hereby STIPULATE and respectfully REQUEST that the Court vacate and continue the Case Management Conference (“CMC”), presently scheduled for December 7, 2022, and stay this action for sixty (60) days while the parties finalize resolution of this matter.

On November 23, 2022, defendant U.S. Customs and Border Protection (“CBP”) produced the final set of documents in response to the underlying Freedom of Information Act (“FOIA”) requests at issue in this action. On November 29, 2022, counsel for the Parties met and conferred and reached an

1 agreement in principle that no issues remained for the Parties to resolve.

2 Therefore, the parties agree that all disputes and deadlines should be stayed for a period of sixty  
3 (60) days, until January 30, 2023, so that the parties may finalize the terms of dismissal and file an  
4 appropriate stipulation pursuant to Rule 41(a) of the Federal Rules of Civil Procedure.

5 In the event that the parties require additional time beyond January 30, 2023 to finalize the  
6 aforementioned resolution, the parties agree to submit another stipulation by that date.

7 SO STIPULATED.

8 \* \* \*

9  
10 Respectfully submitted,

11 STEPHANIE M. HINDS  
United States Attorney

12 Dated: November 30, 2022

13 By: /s/ Michael A. Keough  
MICHAEL A. KEOUGH  
Assistant United States Attorney  
14 Attorney for Defendants

15  
16 Dated: November 30, 2022

17 By: \*\*/s/ David P. Enzminger  
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22 \*\* Pursuant to Civ. L.R. 5-1(h)(3), the filer of the document  
23 has obtained approval from this signatory.

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.** The Case Management Conference, presently scheduled for December 7, 2022, is vacated. The matter is stayed until January 30, 2023. If the parties complete resolution of the case prior to that date, they shall file a stipulation of dismissal. If the parties do not complete resolution of the case prior to that date, they shall file a status update with the Court by January 30, 2023.

Dated: December 1, 2022

